

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

DUANE & VIRGINIA LANIER TRUST,
individually and on behalf of all others
similarly situated,

Plaintiffs,

Case No. 15-cv-00634-G

v.

SANDRIDGE MISSISSIPPIAN TRUST I,
et al.,

Defendants.

**JOINT STIPULATION AND MOTION TO STAY OUTSTANDING MOTIONS
AND DEADLINES AS TO DEFENDANTS JAMES BENNETT AND MATTHEW
GRUBB AND TO SET DATE FOR PRELIMINARY SETTLEMENT APPROVAL
MOTION**

Defendants James Bennett and Matthew Grubb and Lead Plaintiffs Ivan Nibur, Deborah Rath, Jase Luna, Matthew Willenbacher, Reed Romine, and the Duane & Virginia Lanier Trust (“Lead Plaintiffs”), by and through their undersigned counsel, submit the following stipulation and jointly move the Court to stay all pending motions and outstanding case deadlines applicable to Messrs. Bennett and Grubb, and to set a date for Lead Plaintiffs to file a motion for preliminary approval of a proposed settlement agreement between Messrs. Bennett and Grubb (together, the “Parties”).

STIPULATION AND JOINT MOTION

WHEREAS, on November 11, 2016, Lead Plaintiffs filed a Consolidated Amended Complaint for Violations of the Federal Securities Laws (ECF No. 78);

WHEREAS, on February 15, 2018, Lead Plaintiffs filed a Motion for Class Certification, Appointment of Class Representative, and Appointment of Class Counsel (ECF No. 170) (the “Motion for Class Certification”);

WHEREAS, on September 6, 2019, the Court conducted a hearing on Lead Plaintiffs’ Motion for Class Certification;

WHEREAS, pending before the Court are numerous Outstanding Motions, as defined in the Court’s Twelfth Amended Scheduling Order (ECF No. 432), including, *inter alia*, the Motion for Class Certification; Messrs. Bennett and Grubb’s Motion for Summary Judgment (ECF No. 370); Defendants’ Motion for Reconsideration Under Rule 54(b) (ECF No. 361); and multiple *Daubert* motions to exclude expert testimony (ECF Nos. 365, 367, 368);

WHEREAS, the Parties participated in an in-person mediation with Judge Layn R. Phillips on December 13, 2019, and continued settlement discussions thereafter;

WHEREAS, on June 7, 2021, Lead Plaintiffs and Defendant Tom L. Ward filed a Stipulation and Joint Motion to stay outstanding motions and deadlines as to Mr. Ward and to set a date for Lead Plaintiffs’ preliminary settlement approval motion;

WHEREAS, the Parties have now reached an agreement in principle to settle all claims asserted against Messrs. Bennett and Grubb, subject to, among other items, definitive documentation and the Court’s approval, and Messrs. Bennett and Grubb request to join in Mr. Ward’s motion to stay;

WHEREAS, the Parties are continuing to formalize the final terms of the settlement;

**NOW THEREFORE, MESSRS. BENNETT AND GRUBB AND LEAD
PLAINTIFFS HEREBY STIPULATE AND MOVE THE COURT TO ISSUE THE
FOLLOWING ORDER:**

1. Messrs. Bennett and Grubb's motion for summary judgment, and all other Outstanding Motions and pending deadlines with respect to Messrs. Bennett and Grubb, are stayed;
2. Lead Plaintiffs will move for preliminary approval of the settlement on or before September 1, 2021 or, if unable to do so by that date, Lead Plaintiffs will file a further stipulation requesting additional time to seek preliminary settlement approval.

IT IS SO STIPULATED

Dated: August 2, 2021

Respectfully submitted,

CROWE & DUNLEVY

/s/ Evan G.E. Vincent

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permission of Attorney)
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Dated: August 2, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2021, I electronically transmitted the attached Joint Stipulation and Motion to Stay Outstanding Motions and Deadlines as to Defendants James Bennett and Matthew Grubb and to Set Date for Preliminary Settlement Approval Motion using the ECF system for filing, which will send notification of such filing to all counsel registered through the ECF System.

/s/ Evan G.E. Vincent